

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: KEVIN HUDSON KEMP
Debtor**

**CHAPTER 12
CASE NO. 20-00655-NPO**

**MOTION FOR ADDITIONAL TIME WITHIN
WHICH TO FILE PLAN OF REORGANIZATION**

COMES NOW Kevin Hudson Kemp (the “Debtor”), and files this his Motion for Additional Time Within Which to File Plan of Reorganization (the “Motion”), and in support thereof, would show unto this Honorable Court as follows, to-wit:

1. Debtor’s Plan of Reorganization (the “Plan”) is due to be filed May 26, 2020.
2. Subsequent to the filing of the Petition herein, Debtor has engaged in extensive study of his reorganization potential, cash flow information and ability to service his major secured creditors’ secured claims.
3. As a result of these ongoing reviews, Debtor has preliminarily formulated a plan of reorganization, but it is not in final form as of today’s date.
4. The Debtor lost some time in connection with 2020 planting as a result of COVID-19 and the “stay at home” requirements issued by various government authorities with respect to obtaining his production loan for 2020. While Debtor is now in the process of planting his 2020 crops, the delay in obtaining his production loan has placed him further behind with respect to the actual acreages that will be planted so he is not in a position to project actual crop acreage planted for a cash flow formula.
5. In addition, various creditors have filed motions for relief from the automatic stay which have not yet been resolved or heard by the Court. Resolution of the pending motions for relief from the automatic stay will aid the Debtor in connection with either carrying forward adequate

protection agreements, or adequate protection requirements of the Court, or orders lifting the automatic stay as to certain property in formulating a much more accurate cash flow projection for 2020 (and beyond).

6. Accordingly, Debtor moves the Court for an Order extending the time within which to file his plan for an additional forty-five (45) days from the entry of an Order granting the Motion.

7. Other grounds to be assigned upon a hearing hereof.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that upon a hearing hereof, this Honorable Court will enter its Order granting the Motion. Debtor prays for general relief.

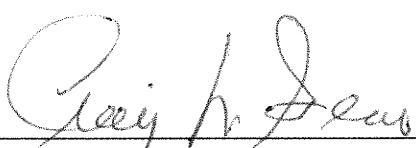
THIS, the 20th day of May, 2020.

Respectfully submitted,

KEVIN HUDSON KEMP

By His Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 

Craig M. Geno

OF COUNSEL:

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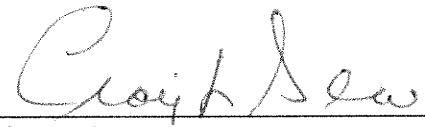
CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing to the following:

Harold J. Barkley, Jr., Esq.
hjb@hbarkley13.com

Christopher J. Steiskal, Esq.
christopher.j.steiskal@usdoj.gov

THIS, the 20th day of May, 2020.



Craig M. Geno